#### **DATA USED TO MAKE DETERMINATIONS:**

Q: What data is used to determine preliminary eligibility?

A: For FY 2022, we used the 2019-2020 dataset from IPEDS and PEPS (Federal Student Aid).

Q: How does COVID-related variables (enrollment/funding/expenses) affect data and decisions? A: All institutions are still subject to the same measures from the same base year. If the campus believes that COVID affects one or both criteria, they are eligible to submit an application and waiver as described in the regulations and application booklet.

Q: Can you define "half-time" student? What hours qualify as student as the designation? A: Half-time is dependent on the institution's definition of half-time.

Q: Can we use the IPEDS core expense calculation for the Core Expense portion of the application? A: Yes, you can use the same core expense calculation from IPEDS.

Q: Is the data we are asked to enter the application different from the data than the system automatically pulls for us for the initial determination?

A: It could be.

Q: We meet the eligibility for the Needy Student requirement but not for the Core Expense per FTE requirement. Are we still able to apply for eligibility for cost-share waiver?

A: Yes, you would need to submit an application/ waiver request for the eligibility requirements if you are seeking the Federal Cost-Share Waiver.

Q: What is the actual eligibility year. Is it a year from when eligibility has been granted or January - December?

A: Eligibility is for FY 2022. This is from October 1, 2021, to September 30, 2022. Grants awarded during this period would begin on October 1, 2022. For the Federal Cost-Share Waiver, the dates are July 1, 2022, to June 30, 2023.

Q: We are a branch campus that only offers 2-year programs. However, our main campus offers 4-year programs. Do we classify ourselves as a 2-year or 4-year institution when applying to be an eligible institution?

A: This would be based on whatever your designation is in IPEDS for your campus.

Q: Are there samples of successful and unsuccessful applications and/or exemption requests? And, if so, how can an institution obtain these for guidance?

A: There are not. However, we can assist where campuses have questions.

Q: Can you give some examples of appropriate supporting documents?

A: This is going to be based on the campuses process. Each campus may have different data supporting the various waiver requests. For Needy Student waivers, common data sources include but are not limited to: multiyear trends in enrollment and retention data; excerpts of the Strategic Plan; or reports of initiatives that increase the enrollment, retention, and/or completion of populations that have been historically underrepresented in higher education.

For Core Expenses waivers, common data sources include but are not limited to: cost of living data that exceeds the national average; higher than average heating and/or cooling costs due to geographic location; or reports of initiatives that seek to reduce the energy consumption on the campus through various approaches.

Q: If a college has a large percentage of high school students, isn't it impossible to meet the core expenses requirement?

A: High school students can be counted in the Core Expenses per FTE number. However, they cannot be counted in the Needy Student number.

Q: Can completing the application with internal data suffice?

A: Yes, you may have data that is different than what IPEDS has if those data are accurate and can provide support of your request. For example, we use two different calculations for the needy student requirement. Pre-eligibility is based on Pell percentage.

Q: To confirm that High School students enrolled in dual enrollment programs are not eligible in the total count for eligibility, if an IHE has early college branch campuses that are also public high schools, would those students be eligible?

A: High School students cannot be counted towards the needy student values as they aren't eligible for federal Title IV funds. They can be counted towards the Core Expenses/FTE criterion.

Q: Curious as to why graduate students are included in the needy student percentage calculation since it's based on grants (Pell, SEOG) that graduate students aren't eligible for.

A: Federal Work Study is also included in the Needy Student criterion. Graduate students are eligible for Federal Work Study.

Q: (This is specifically for HSI) For estimating our own eligibility and doing calculations - do we use FALL enrollment IPEDS, or 12-month? I ask because I believe the matrix is using Fall, but I saw in Title 20 that it says "(B) has an enrollment of undergraduate full-time eq. students that is at least 25% Hispanic at the end of the award year...." - which sounds like a full year number.

A: You would want to contact the program lead at the Department of Education for the HSI program from which you are seeking funds. More information can be found at <u>Developing Hispanic-Serving Institutions Program - Title V (ed.gov)</u>. I believe they use 12-month undergraduate FTE at the time of the award.

Q: If the eligibility matrix shows >25% Hispanic population for our college, are there additional steps necessary to apply as an HSI?

A: You will still follow the instructions that are set forth in the Notice Inviting Application (NIA) for the program.

Q: What is the difference between the eligibility matrix using IPEDS data and the eligibility application? Is an eligibility application required or can we just use the determination in the eligibility matrix? A: The applications are updated data from the institution for different types of variables. You do not have to submit an application if the system pre-determines your campus as eligible for that fiscal year (based on IPEDS data).

## **MINORITY STUDENT REQUIREMENTS:**

Q: When you say Hispanic or Native American - is that the federal reported ethnicity/race or anyone who indicates they are Native American or Hispanic?

A: Those are the federal definitions set forth in the Higher Education Act.

Q: Can you confirm the ANNH grant specific requirements as it doesn't seem right. Alaska Natives or Native Hawaiians are not mentioned.

A: The eligibility matrix uses proxies for the ANNH programs due to the reporting requirements for IPEDS data. Institutions will submit Native Hawaiian and Alaska Native percentages on their applications for the grant. You will follow the requirements in the specific grant NIA.

# **WAIVERS/EXEMPTIONS:**

Q: Would you consider at some point perhaps waiving the need to apply for a waiver if an institution has applied and been granted a waiver for a certain length of time? That is, if an institution has received a waiver at least 5 or 10 years, could the interval between waiver applications be extended to every 3 or 5 years?

A: This would require a statutory change in the Higher Education Act.

Q: If an institution applies for Needy Student Waiver Option #6, are there associated reporting requirements to demonstrate achievement of the stated program implementation and student enrollment objectives?

A: There are not.

Q: Does the Waiver qualify an institution for designation as an Eligible Institution under Title III and V programs or it simply qualifies an institution for non-federal cost share waiver only?

A: It qualifies them for both.

## **COVID RELATED:**

Q: Will the impact of COVID on institutional enrollments and finances be considered now and next year? Regarding requirements, do you consider the impact of COVID which may have caused significant numbers of Asian or Hispanic students to drop out?

A: No, all numbers are based on the base-year data, and we will continue to follow all regulatory requirements for eligibility.

Q: Will COVID related enrollment declines be considered evidence for exemptions under Core Expenses Waiver Option #1?

A: Yes.

#### PROGRAM SPECIFIC:

Q: Can you apply for Title III if you currently have a CAMP, HEP or HSI grant?

A: You should apply for eligibility annually. Various programs have specific grant requirements pertaining to other grant programs. I would recommend contacting the program lead regarding such prohibitions.

Q: Can an institution receive an HSI STEM grant and a Title V grant?

A: Yes. HSI STEM is a part F program and is allowed across program types.

Q: It also says I'm eligible for these programs. Is there a separate application or process I need to do for these?

A: Each program has their own application. This process is for general eligibility. This process is not the grant application process. This process determines your eligibility to apply for grants.

Q: Can eligible institutions have both an AANAPISI and HSI Funding?

A: It depends. Contact the program leads. Some types of funds are allowed across program areas, while others are prohibited.

Q: If we already receive Title III funding as a tribal college does any of this apply to us? A: No, HBCUs and TCCUs are not required to apply for eligibility.

Q: If I am deemed eligible for SIP 031 A/F programs am I also able to apply for HSI programs? If not, is there the ability to apply for an exemption at the program level? Also where do I go to find what grants are available under SIP?

A: Maybe. Contact the program officer for the program you are interested in and that you believe you have met the programmatic requirements. Please remember that this process is for eligibility for Titles III and V grant programs.

Q: What is the difference between this eligibility for Titles III and V that is due in a couple weeks vs the Eligibility that was due in March/April for AANAPISI? Is the latter program specific, and would we need to complete this eligibility due in January first?

A: That was for FY 2021. This is for FY 2022. Keep in mind there are also grant application deadlines if you are interested in funding.

Q: You referenced institutions receiving SSS funds, in our case TRIO grants, may already be qualified. I have always applied for the waiver and more recently with an exemption explanation. Is this necessary for us given that we are a TRIO grant recipient and have been for 20 years?

A: Any questions about the SSS programs should be directed to their office.

Q: My college's eligibility determination for FY2022 states "no application needs to be submitted" under pre-eligibility. Under both Application and Exemption, it states "you do not need to submit an application". How can we be sure that we have an exemption?

A: You should have a letter stating that you are eligible when you login.

Q: When I log into the OPE/IS website I cannot see to find our eligibility status. Can you tell us where to look for this?

A: You may need access to the GEA subsystem. I would recommend sending an email to <a href="https://helpDesk@thetactilegroup.com">helpDesk@thetactilegroup.com</a> and request access for your HEPIS account.

Q: My institution is approved for new grants. I've downloaded the letter. Do I need to do anything for approval for the waiver of matching?

A: All questions regarding the match should be directed to Federal Student Aid at <a href="mailto:CODSupport@ed.gov">CODSupport@ed.gov</a>.

Q: May more than one branch campus apply for different grants?

A: Yes, if they are considered an eligible branch campus for the specific programs.

Q: I filled out the eligibility application in April 2021 and received my eligibility letters. Do I complete another application for this deadline?

A: That was FY 2021. This is FY 2022. This is an annual process that must be completed every year.

Q: If your university has been receiving its Designation as an Eligible Institution each year, does a new application need to be submitted or is this information obtained through the FISAP?

A: Campuses must check their status annually.

Q: Once an institution has received its designation, is it automatically carried forward or is an annual application necessary to receive the designation for the following year?

A: Campuses must check their status annually.

#### **ELIGIBILITY MATRIX AVAILABILITY:**

Q: Will you be posting the FY22 Eligibility Matrix on your website?

A: We will be making some adjustments to the FY 2022 Matrix that will be publicly available later this spring.

Q: If the application deadline is January 2022, why is the 2022 Eligibility Matrix not available now? Wouldn't that be essential to the application process?

A: No, each institution can look up their information in the HEPIS system. Institutions do not need access to the full eligibility matrix. The current matrix will change as applications are received and waiver requests are made/approved/denied.

Q: It appears that the EM is released after the January 21, 2021, deadline to apply for designation as a Title III or Title V institution and waiver of the non-federal share requirement for FWS and FSEOG. How do we know if we need to submit an application for the designation if the EM is not yet released? A: You must login to the HEPIS system as directed in the NIA that was posted on December 16.

## **RECORDING/SLIDES AVAILABILITY:**

Q: Will this recording be available for those who registered?

A: The recording will be made along with the FAQ and the slides.